

June 4, 2008

Mr. Larry Prather  
HQUSACE  
Attn: P&G Revision  
CECW-ZA  
441 G Street, NW  
Washington, DC 20314-1000

Subject: *Comments on Revisions to the "Economic and Environmental Principles and Guidelines for Water and Related Land Resources Implementation Studies" dated March 10, 1983.*

Dear Mr. Prather:

On behalf of the Everglades Foundation and Everglades Trust, we offer comments to proposed revisions to the "Principles and Guidelines" that were directed by Section 2031 of the Water Resources Development Act of 2007. These revisions are long overdue, and it is imperative that these new principles and guidelines reflect the values and concerns of the majority of Americans.

The Everglades Foundation and the Everglades Trust are organizations focused on the protection and restoration of the Everglades, one of America's premier natural treasures. As such, we are acutely aware of the importance of the Principles and Guidelines. We have seen how past misguided policies have resulted in enormous environmental damage and a deterioration of environmental quality, requiring further public investment of potentially hundreds of billions of dollars to rectify. We witness daily how the current Policies and Guidelines have stymied well-intentioned and genuine efforts by the Corps of Engineers to implement projects having primarily environmental objectives. Our experiences allow us to offer the following constructive recommendations for inclusion into the Principles and Guidelines for national water resources planning policy:

1. The Principles and Guidelines must recognize that environmental restoration and enhancement of environmental quality are national values, and valid objectives for water resources projects. The current guidelines use only "Net Economic Development," which does not recognize environmental considerations as objectives. Yet, the Everglades experience provides several examples where Congress has directed the Secretary of the Army to implement projects based upon their expected environmental enhancements. Section 2031(a) of WRDA 2007 recognizes protecting and restoring natural systems as one of the national priorities that water resources planning policy should include. This also acknowledges that, in the future, the Corps' portfolio of projects is likely to increasingly include efforts that are primarily ecosystem enhancements.
2. The Principles and Guidelines need to incorporate a watershed context for

planning. This is a widely-recognized and widely-applied principle that assures a comprehensive planning perspective, helping to ensure that the complex interactions between water and other systems are properly evaluated. The State of Florida, for example, enshrined this principle into water law in 1976, and set up water management districts on watershed boundaries. The Corps' present piece-meal project-by-project approach has been overly cumbersome, and has lead to unintended and adverse consequences outside of a project's scope.

3. The Principles and Guidelines must recognize that planning and implementation are in collaboration with other federal and non-federal organizations. The Principles and Guidelines should recognize that the Corps' role will depend upon roles of the other agencies. These other agencies may even play the primary role in some or all aspects of a project. For example, the South Florida Water Management District, the non-federal sponsor in most of the Everglades restoration projects, has planning and technical expertise that often exceeds that of the Corps of Engineers on these local projects. Success on these projects is entirely reliant on each partner contributing their organizations' strengths, without unnecessary duplication of effort, or forcing partners to accept the Corps planning model.
4. The Principles and Guidelines should also acknowledge that the associated Procedures will reflect the range of policy objectives. A single set of Procedures that apply to every type of project under all circumstances is not realistic. The Principles and Guidelines should recognize that a set of Procedures that is self-consistent and entirely compatible with federal law and with the Principles and Guidelines can serve as the regulatory mechanism for project development. In the example of Everglades restoration, the "Programmatic Regulations" mandated in WRDA 2000 would serve such a role. Forcing each project to conform to procedures incompatible with the project objective is unnecessarily bureaucratic, wasteful and time consuming.

In summary, we think this is an excellent opportunity of the Corps of Engineers to update their mission to reflect current national priorities.

Thank you for your consideration on this vitally important water resources issue.

Sincerely,

Kirk Fordham, President  
The Everglades Foundation

E. Thom Rumberger, President  
The Everglades Trust